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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERALD DICKERSON, AND
AMY WILLIAMS,

Defendants.

CASE NO. 1:21-CR-00224-DAD-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: March 13, 2024

TIME: 1:00 p.m.

COURT: Hon. Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on March 13, 2024.
2. By this stipulation, defendants now move to continue the status conference until April 24, 2024, and to exclude time between March 13, 2014, and April 24, 2024, under 18 U.S.C. 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - (a) Gerald Dickerson ("Mr. Dickerson") relieved his Defense Counsel on March 6, 2024. He has requested additional time to retain new private Counsel. A continuance until April 24, 2024 will allow him ample time to retain new Counsel.
 - (b) Sheila L. Mohsini ("Ms. Mohsini") will be in trial through April 12, 2024 and out of state the week of April 15, 2024.
 - (c) Counsel for defendants believe that failure to grant the above-requested continuance would deny him the reasonable time necessary time to find a new Defense Counsel.

(d) the government does not object to the continuance.

(e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

(f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of March 13, 2024 to April 24, 2024 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial.

(g) The parties also agree that this continuance is necessary for several reasons, including but not limited to, the need to permit time for the parties to exchange supplemental discovery, engage in plea negotiations, and for the defense to continue its investigation and preparation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED:

Date: March 7, 2024

PHILLIP A. TALBERT United States Attorney

/s/ STEPHANIE M. STOKMAN

STEPHANIE M. STOKMAN
Assistant United States Attorney

Dated: March 7, 2024

/s/ SHEILA L. MOHSINI

SHEILA L. MOHSINI
Counsel for Defendant GERALD DICKERSON

Dated: March 7, 2024

/s/ REED GRANTHAM

REED GRANTHAM
Counsel for Defendant AMY WILLIAMS

ORDER

IT IS SO ORDERED that the status conference is continued from March 13, 2024, to **April 24, 2024 at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **March 8, 2024**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE